The Honourable Wayne Cheverie
Minister Responsible for Human Rights
Province of Prince Edward Island

Sir:

We are privileged to submit to you, the Minister Responsible for Human Rights within the Province of Prince Edward Island, the Ninth Annual Report of the Prince Edward Island Human Rights Commission for the calendar year ending December 31, 1985.

Respectfully submitted

Allan F. MacDonald
Chairperson

CHAIRPERSON'S REMARKS

This ninth annual report contains a detailed record of the disposition of complaints filed under the provincial Human Rights Act. In these introductory remarks I will reflect on the situation of those people who turn to this Commission for assistance but whose complaints and grievances do not fall under Human Rights legislation. A major function of this Commission is advising and directing these persons toward appropriate means of recourse, if such exist.

I refer here to the many persons who turn to the Commission for assistance. Generally these people are poor, the result of underemployment or unemployment. Each has experienced a disadvantagement or discrimination of some sort and comes to the Commission with at least a minimal hope of help. Frequently the Commission is contacted as a last resort when all other avenues of assistance have been exhausted.

Whatever the institutions of justice may be, these individuals have limited access to them. They cannot afford the legal services of a lawyer when their complaint falls under the jurisdiction of civil law. While there is a legal aid program for criminal and family related cases, there is none for civil matters. While lawyers do provide special assistance to those in need of legal services, there is a limit to what should be expected of them. Doubtless many in the legal profession experience what this Commission does - a sense of frustration that more effective assistance cannot be given. However, our discomfort is minimal in comparison with the pain and anguish experienced by those who have no recourse to have their complaints and grievances heard or those for whom the wheels of justice grind so slowly.

This Commission believes that a program of civil legal aid is an imperative so that these individuals may also have access to the justice system. The extent of the need is clearly documented in the large number of calls received by this Commission during a year in comparison to the number of complaints filed under the P. E. I. Human Rights Act.

The Commissioners express their thanks and appreciation to the Executive Director, the Administrative Officer and all others who assisted the Commission in its work.

THE P. E. I. HUMAN RIGHTS ACT

The P. E. I. Human Rights Act was assented to by His Honour the Lieutenant Governor on December 12, 1975, and proclaimed by the Lieutenant Governor in Council in September, 1976. The Act became the paramount law of the Province in September of 1979, three years from the date of its proclamation. The target of the Act is the elimination of discrimination and though the term "human rights" encompasses a wide variety of rights, the Human Rights Commission can only deal with discrimination in certain specific areas and for a limited number of reasons.

The P. E. I. Human Rights Act protects Island residents from discrimination in four areas -- employment and access to services, accommodations and facilities because of race, religion, creed, colour, sex, marital status, ethnic or national origin, physical or mental handicap, age and political belief. The Act also prohibits discrimination in pay and employers must give equal pay to people doing essentially the same work.

This year the Provincial Legislature amended the P. E. I. Human Rights Act to bring it into conformity with Section 15, the Equality Rights Section, of the Canadian Charter of Rights and Freedoms. This was achieved by deleting the age limitations of 18 - 65 from the definition of age, leaving no minimum or maximum age for age discrimination and by adding mental handicap to the Act as a proscribed ground of discrimination.

The P. E. I. Human Rights Act is not a criminal code nor is the Commission a court of law. The Commission has the responsibility to investigate and attempt to settle any complaint filed under the Act. If the Commission is unable to accomplish this, a report is forwarded to the Minister Responsible for Human Rights and he has the

authority to convene a Board of Inquiry to deal with the complaint. The Commission, however, is a party to any complaint coming before a Board of Inquiry.

P. E. I. HUMAN RIGHTS COMMISSION

The P. E. I. Human Rights Commission, as mandated by the P. E. I. Human Rights Act, is composed of three Commissioners. These Commissioners are appointed for a three-year term by the Lieutenant Governor in Council. The terms of the three Commissioners are staggered so that the term of office of only one Commissioner expires in any given year. This year Mr. Richard Noonan of Summerside was appointed to the Commission to replace Mr. Kenneth Birtwistle whose second term as a Commissioner expired on July 1, 1985. For the first time the Commission has a member from each of the three counties in the Province. During 1985 the Commission was comprised of the following members:

Allan F. Macdonald, Chairperson, reappointed September 18, 1983;
Kenneth Birtwistle, term of office July 1, 1982 - July 1, 1985;
Ruth MacLeod, reappointed December 13, 1984;
Richard Noonan, appointed August 1, 1985.

The administrative staff, working under the direct supervision and direction of the Commission, was composed of the following individuals:

Thomas W. Klewin, Executive Director;
Jewel Macdonald, Research-Intake Officer.

The Commissioners

Allan F. MacDonald, Ph.D., Chairperson, Glenfinnan, January - December, 1985

Father MacDonald is a sociology professor at the University of P. E. I. Prior to his doctoral degree at the Catholic University of America, he studied at St. Dunstan's, St. Augustine's Seminary, and the University of Toronto. As Director of Extension at St. Dunstan's he initiated programs in labour relations, social action, and community development. During the decade 1965-75 he was involved in the formation and direction of the P. E. I. Rural Development Council, later serving as Chairperson. He is the official P. E. I. representative on the Continuing Committee of Federal-Provincial Officials Responsible for Human Rights.

Kenneth Birtwistle, Commissioner, Charlottetown,
January - June, 1985

Kenneth Birtwistle is currently serving as a Director of the Canadian Foundation for Polio and as a member of the Naval Benevolent Fund. In addition, he is a member of the Rotary, the United Services Officers' Club and the Royal Canadian Legion. He held the position of Executive Director of the P. E. I. United Way for a period of ten years. His position with the United Way brought him into close working cooperation with a wide variety of agencies, including many whose members have a special involvement with the protection offered them in the P. E. I. Human Rights Act. He served in the Canadian Navy from the onset of World War II until 1962, retiring with the rank of Commander. In addition to sea appointments he served in Ottawa as Deputy Director, Naval Intelligence and as Deputy Director, Naval Organization, as well as on the NATO staff in Norfolk, Virginia.

Ruth MacLeod, Commissioner, Montague,
January - December, 1985

Ruth MacLeod is currently the Secretary of the Board of Directors of the Montague Housing Authority and Secretaty-Treasurer of the Montague Christian Church.

In 1960 she was appointed Secretary of Montague Regional High School Unit and in 1972, when the larger Units of School Administration were formed, she was appointed Superintendent of Business Affairs for Regional Administrative Unit Four and continued in that position until retirement in November, 1979. She has been an active member of the Kings County Hospital Ladies' Auxiliary; is a Past President of the Montague Home and School Association and the Provincial Womens' Progressive Conservative Association. She has also been active in various community projects such as Community School and a Community Choir.

Richard Noonan, Commissioner, Summerside,
August - December, 1985

Richard Noonan received his B. A. from St. Dunstan's University in 1957, his B. Ed. from St. Francis University in 1959 and his Dip. Ed. from the University of New Brunswick in 1970. He is a former member of the Summerside Lions Club, the Summerside Junior Chamber of Commerce, the Prince County Welfare Agency Board of Directors, the P. E. I. Museum and Heritage Foundation, and the P. E. I. Department of Education Senior Social Studies Committee. He also was a Lieutenant in the Royal Canadian Navy, as well as a teacher, Vice-Principal and Principal of Summerside High School. He is currently the Assistant Superintendent of Regional Administrative Unit Two, a member of the George R. Pearkes, V. C. branch of the Royal Canadian Legion, the Summerside Citizen of the Year Committee and the School Administrators of P. E. I.

THE ROLE OF THE COMMISSION

Unlike most other provincial Commissions, the P. E. I. Commissioners are directly involved in providing guidance in the investigation and settlement of complaints as well as in other aspects of the operation of the Commission which are normally the function of most Human Rights Commission staffs. Since the Commission's staff, resources and the man-hours available for the staff are limited, the P. E. I. Commissioners must assume a larger function and role in the activities of the Commission.

During 1985 the Commission held nineteen regular meetings. Two of the Commissioners attended the annual meeting of the Canadian Association of Statutory Human Rights Agencies while the Commission's Chairperson, Allan F. MacDonald, represented the Province at the Federal-Provincial-Territorial Conference on Human Rights.

Policy decisions were also formulated and major human rights issues discussed and reviewed at Commission meetings. During the past year the Commission dealt with the following major issues, policies and procedures:

1. Pregnancy and Sex Discrimination. The Commission issued a policy decision, based on precedent-setting Court decisions and Boards of Inquiry, that pregnancy is not sex-related and, consequently, the Commission could not accept complaints alleging discrimination based on pregnancy.

2. Age Discrimination/Mandatory Retirement. The Commission issued a policy statement indicating that, with the amendment bringing the P. E. I. Human Rights Act into conformity with the Equality Rights Section of the Charter regarding age discrimination, mandatory retirement could not be automatically imposed on those individuals reaching the age of sixty-five. The Guidelines established by the Supreme

Court of Canada as well as by other Court decisions and Boards of Inquiry would be used by this Commission in determining age discrimination complaints.

3. Auto Insurance and the P. E. I. Human Rights Act. The Commission examined available and relevant data relating to discrimination in the issuance of automobile insurance based on age, sex and marital status and concluded that differential rates based on these criteria are discriminatory.

4. Guidelines for Foster Parenting and Adoption. By accepting several complaints relating to foster parenting and adoption, the Commission concluded that all legislation and regulations concerning foster parenting and adoption must be non-discriminatory or meet the "bona fide" requirements of the P. E. I. Human Rights Act.

5. Settlement Policy. The Commission developed a policy clearly defining the difference between financial compensation for lost wages and financial compensation for injury to dignity, emotions and self-esteem in mediating the settlements of complaints.

6. Discrimination and Social Service Assistance. The Commission accepted a complaint in which it was alleged that the Department of Health and Social services had discriminated against a couple because of marital status. By accepting the complaint, the Commission reaffirmed its position previously announced that Social Services' assistance must be offered on a non-discriminatory basis.

7. Dress Code and Sex Discrimination. In dismissing a complaint based on a difference in a dress code for males and females, the Commission formulated a policy distinguishing between reasonable dress codes for both sexes and discriminatory dress codes which are applied unequally between males and females.

8. Definition of Mental Handicap. With the addition of mental handicap to the proscribed grounds of discrimination, the Commission established a definition of "mental handicap" as follows:

a) a condition of mental retardation or impairment

b) a mental or emotional disorder

c) a learning disability or learning dysfunction

9. Policy on Physical Examinations. In response to a complaint filed with the Commission, the Commission researched and developed a policy relating to the request for a physical examination in seeking employment or gaining access to programs where physical examinations are a pre-requisite to acceptance into the program. The Commission's policy clearly states that physical examinations can only be required after an individual has been conditionally accepted for employment or entrance into a training program.

10. Proposed Amendments to the P.E.I. Human Rights Act. The Commission forwarded to the Legislative Assembly the following proposals for amendments to the P. E. I. Human Rights Act:

a) That pregnancy be included in the definition of "sex", so that complaints based on pregnancy can be accepted by the Commission.

b) That "family status" be included as a prohibited ground of discrimination.

c) That "social condition" be added as a prohibited ground of discrimination.

d) That an amendment be included to extend the protection of the Human Rights Act to individuals being discriminated against through group insurance coverage.

e) That the Commission be authorized to initiate complaints.

11. Increase in Phone Service. There has been a dramatic increase in the number of telephone calls to the Commission emerging from a greater visibility of the work of the Commission and an increase in the recognition by the public of their rights in seeking assistance for protecting these rights. To meet this need the Commission installed a second phone line, 894-5630, as a toll-free line, making access to the Commission equally available to all persons living in Prince Edward Island.

12. A Study of the P.E.I. Human Rights Act. Because of the increasing complexity of complaints received and the convening of three Boards of Inquiry, the Commission found it necessary to review the adequacy of the P. E. I. Human Rights Act, particularly in the light of recent Boards of Inquiry and Court decisions. A more thorough review and revision of the Act will be carried out in 1986.

13. Legal Counsel for the Commission. The Commission has found it increasingly necessary to seek legal advice and assistance and requested that one member of the Justice Department's staff be designated as legal counsel for the Commission. This request was approved and has provided the Commission with a legal counsel, Ms. Linda Gaudet, who has become familiar with human rights principles, legislation and precedent-setting decisions.

14. Meetings with Government Departments. During the year the Commission made formal presentations to the Departments of Labour and Social Services as a part of its mandate to "advise the government on suggestions, recommendations and requests made by private organizations and individuals". The Commission also made a presentation to the Parliamentary Committee on Equality.

15. The Commission reviewed its settlement procedure policy to more clearly define the role of the Chairperson as the Commission Member primarily responsible for mediating settlement meetings between the Complainant and the Respondent.

FORMAL, SIGNED COMPLAINTS

During 1985 the Commission dealt with forty-three formal, complaints, six of which were filed under a multiple discrimination allegation. Twenty were carried over from 1984; three, including the Charles Craig complaint, had been referred to the Minister in 1980. Four political belief complaints are awaiting the Supreme Court decision on the Charles Craig Board of Inquiry definition of political belief. The Commission forwarded four reports to the Minister in 1985. Three of these unsettled complaints were scheduled for Boards of Inquiry early in 1986. The Commission also dealt with seven new areas of discrimination in 1985:

1. employment/age in a context with mandatory retirement;
2. marital status and access to social assistance;
3. age/ physical disability and access to being a foster parent;
4. age and access to travel insurance;
5. employment and discrimination because of having filed a previous complaint;
6. employment and discrimination because of association;
7. employment and mental disability.

A significant number of calls were also received where the apparent discriminatory action fell within the legal parameters of the Human Rights Act. However, many of the complainants were unwilling to file a formal complaint based on the alleged discriminatory factor. The Commission believes that a more visible and far-reaching education program would answer the concerns of those reluctant to pursue their rights under the P. E. I. Human Rights Act.

Table 1 Disposition of Formal, Signed Complaints

	Settled	Referred to Minister	Withdrawn	Carried Over	Dismissed	Total
Age.....	2	1		6	2	11
Race, Colour.....	1					1
Ethnic/National Origin.		1				1
Marital status.....	3			1		4
Physical Disability....	3			5		8
Mental Disability.....				1		1
Religion.....				1	1	2
Sex.....		2		2	1	5
Sexual Harrassment.....				1		1
Association.....				1		1
Filed a Previous Complaint.....				1		1
Political Belief.....		3[a]		4[b]		7
	9	7	0	23	4	43

a. Referred to the Minister in 1980

b. Awaiting Supreme Court decision on the definition of political belief.

Table II Categories of Formal, Signed Complaints

	Employment	Services	Accommo-dations	Facilities	Total
Age.....	3	7	1		11
Race, Colour.....		1			1
Ethnic/National Origin.	1				1
Marital Status.....	1	1	1	1	4
Physical Disability....	5	3			8
Mental Disability.....	1				1
Religion.....	2				2
Sex.....	4			1	5
Sexual Harrassment.....	1				1
Association.....	1				1
Filed a Previous Complaint.....	1				1
Political Belief.....	7				7
	27	12	2	2	43

TYPES OF COMPLAINTS

Employment/Sex

A male complained that he was refused employment as a waiter at an eating establishment because he was a male, and the proprietor preferred females as waitresses. The investigation by the Commission found that the restaurant owner believed that it was Island custom to have waitresses rather than waiters. The Commission concluded that sex was a factor in the refusal to hire the male. When the proprietor of the eating establishment refused to settle, the Commission forwarded its report to the Minister who convened a Board of Inquiry for 1986 to hear the complaint.

Employment/ Sex

A female, Gladys Kickham, filed a complaint when she learned she was not selected to fill a vacancy on the Charlottetown Police Force even though she had placed first in the competition. The Commission's investigation found that one of the reasons she was not selected was the fact she was a female. When the Commission failed to achieve a settlement, a report was forwarded to the Minister who convened a Board of Inquiry for 1986 to hear the complaint. The complaint was filed against the City of Charlottetown since the City Council had given the Selection Committee the mandate to select the candidate to be hired as a police constable by the City. The Commission concluded that the delegation of authority did not absolve the Board of Aldermen from being held responsible for the discrimination against Ms. Kickham.

Employment/Age

A female filed a complaint with the Commission when she was informed by her employer she would have to retire when she reached the age of sixty-five. The Commission concluded that mandatory retirement was a contravention of the Human Rights Act if chronological age rather than

functional age was used as the criterion for imposing mandatory retirement on an employee. The Commission found that no functional evaluation of the employee had been made to determine her ability to continue to function adequately at her job.

Employment/ Pregnancy

The Commission dismissed a complaint filed by a female who alleged her employer had terminated her employment when he was informed she was pregnant. The Commission dismissed the complaint when a review of recent court decisions indicated pregnancy was not a prohibited ground of discrimination under the general category of sex. The Commission has, consequently, submitted an amendment to the Legislative Assembly requesting that pregnancy be specifically included as a prohibited category under the general category of sex discrimination.

Access to Accommodation/Sex

A young male complained that he was refused a rental unit by a landlord because he was a single male. The Commission's investigation disclosed that all the rental units with the exception of the one occupied by the landlord were occupied by single females. The Commission dismissed the complaint since, according to the P. E. I. Human Rights Act, the landlord was legally entitled to restrict his apartment to individuals of the same sex.

Access to Services/ Physical Disability

A woman filed a complaint with the Commission alleging that she was denied the right to be a foster parent because of a physical disability. The Commission did not find sufficient evidence to substantiate the complaint, but did indicate by its acceptance of the complaint that foster parenting and adoption services are access to a service and must, therefore, be conducted in a non-discriminatory manner.

Access to Services/Physical Disability (the condition of alcoholism)

A man complained that he was denied income protection insurance because as a recovered alcoholic he had not reached the required number of alcohol-free years (5) to be considered an insurable risk. The Commission's investigation found that there was no scientific, objective study to validate the insurance industry's criteria of five alcohol-free years. The Commission concluded that, based on its research, the man had been discriminated against by the insurance industry.

COMPLAINTS REFERRED TO THE CANADIAN HUMAN RIGHTS COMMISSION

The P. E. I. Human Rights Commission referred twenty-eight persons to the Canadian Human Rights Commission in Halifax for information relating to their individual complaints. Preliminary investigation of the complaints revealed that the alleged discrimination fell within federal rather than provincial jurisdiction. The Commission assisted these individuals by establishing initial contact with the Canadian Human Rights Commission's regional office in Halifax, Nova Scotia. The majority of the referrals were related to Canada Employment, unemployment insurance, equal access to credit from banks and other federal agencies or services.

The Commission made two presentations to Employment and Immigration Canada to inform them of the types of complaints received by the Commission related to the various Employment Centres of Employment and Immigration Canada. A working agreement was arranged with Employment Canada whereby the complaints could be settled informally and quickly between the P. E. I. Human Rights Commission and Employment Canada.

MISCELLANEOUS COMPLAINTS

Twenty-four inquiries were received by the Commission which might have led to the filing of formal complaints. Some were settled to the satisfaction of all concerned in an informal setting with an explanation of the Act. The majority did not reach the formal complaint stage because the individuals did not choose to pursue the inquiries further. The inquiries which were not pursued because the complainants were reluctant to do so basically fell into three categories -- sexual harrassment, physical or mental handicap and sex. The Commission believes a more intensive education program is required to acquaint the public with their legal rights under the Act and the administrative procedures used by the Commission to investigate and settle complaints, while maintaining the confidentiality of those involved in the complaints.

INFORMAL COMPLAINTS AND INQUIRIES

During 1985 the Human Rights Commission received more than 3,000 calls and office visits from individuals concerned about their rights. While few of these inquiries or complaints could be investigated under the Act, the Commission did attempt to assist these individuals in finding the proper government department or agency to further pursue their complaints and problems. Many of these types of cases are time-consuming, but the Commission believes that providing informational assistance and intervention lies within the spirit of the Act. The majority of these cases could be handled by two agencies or services currently unavailable on the Island -- an Ombudsman and a civil legal aid service.

The most frequent inquiries concerned problems related to civil rights; violations of employment rights; rental difficulties, especially concerning refusal to rent to families with children, students and those receiving social assistance; demands for an individual's SIN number for a wide variety of reasons; problems with Canada Employment, Unemployment Insurance Commission, Worker's Compensation and the Department of Health and Social Services.

MONITORING OF PRE-EMPLOYMENT APPLICATION FORMS

During 1985 the Commission monitored fifteen pre-employment application forms and assisted five companies in preparation of their new forms. In addition, the Commission sent out copies of its pre-employment guidelines for job application forms and personal interviews to various businesses, agencies and individuals.

A major task still confronting this Commission is the monitoring of pre-employment application forms used in Prince Edward Island by businesses and industries. The Commission has received some assistance in this area from concerned individuals who have been asked to complete employment application forms which are discriminatory and who have notified the Commission of the discriminatory employment application forms.

CONTACTS WITH OTHER HUMAN RIGHTS COMMISSIONS; GOVERNMENT MINISTERS, DEPARTMENTS AND AGENCIES, FEDERAL AND PROVINCIAL; PRIVATE FIRMS; INDIVIDUALS AND NON-GOVERNMENT GROUPS

During 1985 the Commission had numerous contacts with other Human Rights Commissions, government departments and agencies both at the federal and provincial levels. These involved correspondence, phone conversations and personal conference with the above-mentioned groups in relation to queries sent to the Commission or initiated by the Commission

as it sought assistance in answering questions or solving problems relating to human rights. Many of the requests were related to the Commission's involvement with new areas of discrimination.

EDUCATIONAL PRESENTATIONS

During 1985 the Commission made twenty educational presentations to a wide variety of organizations and institutions. Because of its manpower constraints, the Commission focused its primary educational outreach to those groups preparing to enter the job market. This was done through seminars conducted at educational programs at the post high school level and at Canada Employment Centre programs designed to prepare individuals for entry into the job market. The Commission believes its educational mandate can only be adequately upgraded and expanded by the addition to its staff of an educational officer whose primary function will be the creation of educational materials and the development of a more comprehensive educational program.

CONTACTS WITH THE MEDIA, NEWS RELEASES

During 1985 the Commission found itself in more frequent contact with the news media through news releases, calls from news journalists seeking information from the Commission concerning human rights issues, and by appearances on radio and television news casts. The increase in the number of calls and visits to the Commission's offices can be attributed to the higher profile the Commission has received through the news media.

PROJECTED GOALS

As the Commission looks to 1986 there are a number of objectives the Commission envisions as its primary goals for the year.

1. Review of Provincial Human Rights Legislation:

The Commission plans to make an extensive review of the current P. E. I. Human Rights Act in preparation for a possible major revision to the Act. The assignment of a Justice Department lawyer to work with the Commission will facilitate this type of review. In addition, the Commission will be evaluating the need for Boards of Inquiry regulations.

2. Educational Materials:

The major changes in the Human Rights Act will require the revision of the Commission's educational materials. In addition, there is a need to revise and update the educational materials produced in 1980.

3. Educational Programs:

The Commission will review its educational mandate and assess what programs can realistically be initiated and implemented with the current level of staffing.

4. Policy Statements:

The Commission will formalize a policy on insurance as it relates to the condition of alcoholism. It will, perhaps, be the first such policy statement issued by a human rights commission and will continue this Commission's pioneering work in the area of the condition of alcoholism.

A policy statement will also be developed in relation to automobile insurance in terms of sex, marital status and age.

The Commission will also develop a policy statement on mandatory retirement as it relates to the legislative change in the definition of age in the Human Rights Act.

A formal policy statement will outline the Commission's position on mental disability as it relates to the rights of employers and employees.

APPENDIX I

P. E. I. HUMAN RIGHTS ACT

An Act to Amend the Human Rights Act (Bill No. 21)

(Assented to May 28th, 1985)

Be it enacted by the Lieutenant Governor and Legislative Assembly of the Province of Prince Edward Island as follows:

1. Section 1 of the Human Rights Act R.S.P.E.I. 1974, Cap. H-12.2 is amended

(a) by the deletion of clause (a.01);*

(b) in clause (d), by the deletion of the words "physical disability" and the substitution therefor of the words "physical or mental handicap";

(c) by the deletion of clause (l) and the substitution therefor of the following:

(l) "physical or mental handicap" means a previous or existing disability, infirmity, malformation or disfigurement, whether of a physical or mental nature, that is caused by injury, birth defect or illness, and includes but is not limited to epilepsy, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guidedog, wheelchair or other remedial device;

2. Subsection 6(4) of the said Act is amended by the insertion after clause (a) of the following clauses:

(a.1) a refusal, limitation, specification or preference based on a bona fide occupational qualification;

(a.2) employment where physical or mental handicap is a reasonable disqualification;

3. Sections 11, 13 and 18(b) of the said Act are amended by the deletion of the words "physical disability" and the substitution therefor of the words "physical or mental handicap".

* Definition of "age" - 18 to 65 years.

APPENDIX I - continued

4. After Section 18 of the said Act there is inserted the following new section:

> 18.1 (1) The Commission may appoint and employ such officers and employees as are required for the proper conduct of its business and may determine their functions, conditions of employment and remuneration.